

*New York*  
One Grand Central Place  
60 East 42nd St., 46th Floor  
New York, NY 10165  
p. (646) 459-7971  
f. (646) 459-7973

*New Jersey*  
375 Passaic Ave., Ste. 100  
Fairfield, NJ 07004  
p. (973) 227-5900  
f. (973) 244-0019



Joseph K. Jones, Esq.<sup>††</sup>  
Benjamin J. Wolf, Esq.<sup>††</sup>  
Anand A. Kapasi, Esq.<sup>†</sup>

<sup>††</sup>Admitted NY, NJ, CT  
<sup>†</sup>Admitted NY, NJ

[www.legaljones.com](http://www.legaljones.com)

Reply to: New York

February 13, 2018

**ELECTRONICALLY FILED**

Hon. Vera M. Scanlon  
United States District Court  
Eastern District of New York  
224 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Claudine Harrison v Berks Credit & Collections, Inc.  
Civil Action No. 1:17-cv-04353 (DLI)(VMS)**

Your Honor:

I write on behalf of Plaintiff and the putative class, *on consent*, to respectfully request that the discovery stay in this matter be lifted and that a discovery schedule be put in place. *See* ECF No. 13.

As ordered by the Court at the October 11, 2017 Conference, discovery was stayed. *See* ECF Nos. 13. Since that time, Defendant's request to make a Fed. R. Civ. P. 12c motion for judgment on the pleadings was denied, and Plaintiff's request to file an Amended Complaint was granted. Accordingly, on December 1, 2017, Plaintiff filed her Amended Complaint. *See* ECF No. 16. On December 15, 2017, Defendant filed its Answer. *See* ECF No. 17. It is respectfully submitted that the parties should now be permitted to engage in discovery.

Thank you for your special attention to this matter. Should you have any further questions, please do not hesitate to contact me.

Respectfully submitted,

/s/ Benjamin J. Wolf  
Benjamin J. Wolf

cc: Monica M. Littman, Esq. (*via* ECF)